

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re	:	Chapter 11
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	Case No. 08-13555 (JMP)
Debtors.	:	Jointly Administered
	:	

DECLARATION OF MATTHEW A. SCHWARTZ

STATE OF New York)
 : ss.
COUNTY OF New York)

Matthew A. Schwartz, being duly sworn, deposes and says:

1. I am a member of the Bar of this Court and a Partner at Sullivan & Cromwell LLP ("S&C"), attorneys for Giants Stadium LLC ("Giants Stadium"). I submit this declaration to provide the Court with materials that are self-authenticating documents or are otherwise not in controversy and that are cited in Giants Stadium's Motion for Leave to Conduct Discovery of LBI Pursuant to Federal Rule of Bankruptcy Procedure 2004.

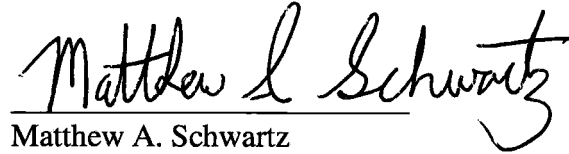
2. Attached hereto as Exhibit A is a true and correct copy of the FGIC-Insured ISDA Master Agreement, dated July 27, 2007, which is identical in all material respects to the FSA-Insured ISDA Master Agreement entered on the same day.

3. Attached hereto as Exhibit B is a true and correct copy of the Discovery Protocol Agreement between Lehman Brothers Holdings Inc. ("LBHI"), Lehman Brothers Special Financing Inc. ("LBSF," and together with LBHI, the "Debtors"), and Giants Stadium, dated April 1, 2013.

4. Attached hereto as Exhibit C is a true and correct copy of Debtors'

Responses and Objections to Giants Stadium's Request for Production of Documents,
dated March 13, 2013.

Dated: New York, New York
April 25, 2013


Matthew A. Schwartz